

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

MISSISSIPPI STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE; DR.
ANDREA WESLEY; DR. JOSEPH WESLEY;
ROBERT EVANS; GARY FREDERICKS; PAMELA
HAMNER; BARBARA FINN; OTHO BARNES;
SHIRLINDA ROBERTSON; SANDRA SMITH;
DEBORAH HULITT; RODESTA TUMBLIN; DR.
KIA JONES; ANGELA GRAYSON; MARCELEAN
ARRINGTON; VICTORIA ROBERTSON,

Plaintiffs,

vs.

STATE BOARD OF ELECTION COMMISSIONERS;
TATE REEVES, *in his official capacity as Governor of
Mississippi*; LYNN FITCH, *in her official capacity as
Attorney General of Mississippi*; MICHAEL WATSON,
*in his official capacity as Secretary of State of
Mississippi*,

Defendants,

AND

MISSISSIPPI REPUBLICAN EXECUTIVE
COMMITTEE,

Intervenor-Defendant.

**CIVIL ACTION NO.
3:22-cv-734-DPJ-HSO-LHS**

**JOINT MOTION TO MODIFY BRIEFING SCHEDULE RE:
PLAINTIFFS' MOTION TO COMPEL LEGISLATIVE SUBPOENA
RECIPIENTS' PRODUCTION OF A PRIVILEGE LOG**

Plaintiffs the Mississippi State Conference of the National Association for the Advancement of Colored People, Dr. Andrea Wesley, Dr. Joseph Wesley, Robert Evans, Gary Fredericks, Pamela Hamner, Barbara Finn, Otho Barnes, Shirlinda Robertson, Sandra Smith,

Deborah Hulitt, Rodesta Tumblin, Dr. Kia Jones, Angela Grayson, Marcelean Arrington, and Victoria Robertson (collectively, “Plaintiffs”); and the Mississippi Standing Joint Legislative Committee on Reapportionment and Redistricting, Ben Collins, Representative Dan Eubanks, Senator Dean Kirby, Representative Charles “Jim” Beckett (fmr.), James F. Booth, Representative Philip Gunn, Neal Smith, Nathan Upchurch, and Lieutenant Governor Delbert Hosemann (collectively, “Legislative Subpoena Recipients”), respectfully move this Court for an order modifying the briefing schedule for Plaintiffs’ Motion to Compel Legislative Subpoena Recipients’ Production of a Privilege Log (“Motion to Compel”) as follows:

<u>ITEM</u>	<u>DUE DATE</u>
Plaintiffs’ Motion to Compel	September 22, 2023
Legislative Subpoena Recipients’ Opposition to Plaintiffs’ Motion to Compel	September 29, 2023
Plaintiffs’ Reply to Legislative Subpoena Recipients’ Opposition to Plaintiffs’ Motion to Compel	October 4, 2023

In support of this motion, Plaintiffs and the Legislative Subpoena Recipients state as follows:

1. On September 15, 2023, Plaintiffs and the Legislative Subpoena Recipients attended a telephonic conference with the Court regarding Plaintiffs’ request to file the Motion to Compel. *See* ECF No. 35. The Court granted Plaintiffs permission to file both the Motion to Compel and a separate motion to expedite the briefing schedule of the Motion to Compel.

2. Following the telephonic conference, counsel for Plaintiffs and the Legislative Subpoena Recipients met and conferred regarding the briefing schedule for Plaintiffs’ Motion to Compel, and agree to the schedule set forth above.

WHEREFORE, Plaintiffs and the Legislative Subpoena Recipients respectfully request that the Court grant this motion and order a modified briefing schedule for Plaintiffs' Motion to Compel, as indicated above.

Respectfully submitted,

FOR PLAINTIFFS

Dated: September 22, 2023

/s/ Joshua Tom

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Dated: September 22, 2023

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CERTIFICATE OF SERVICE

I, Joshua Tom, do certify that on this day I caused to be served a true and correct copy of the foregoing by electronic mail to all counsel of record.

This the 22nd day of September, 2023.

/s/ *Joshua Tom*

Joshua Tom